

**GOTTLIEB & ASSOCIATES**  
ATTORNEYS

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August 16, 2022

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Application GRANTED in part and DENIED in part. The initial conference scheduled for August 31, 2022, at 4:20 P.M., is adjourned to **October 5, 2022, at 4:20 P.M.** The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order required in advance of that conference is extended to **September 28, 2022, at 12:00 P.M.** Defendant shall answer, move or otherwise respond to the Complaint by **September 15, 2022.**

Dated: August 17, 2022  
New York, New York

Re: Senior v. Jason Wu Inc.,  
Case No.: 1:22-cv-5321



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Dear Judge Schofield,

The undersigned represents Milagros Senior on behalf of herself and all other persons similarly situated (“Plaintiff”) in the above referenced matter against Defendant, Jason Wu Inc., (“Defendant”). The undersigned respectfully requests that the Initial Conference scheduled for August 31, 2022, at 4:20 PM (Dkt. 6) be adjourned for 60 days because Counsel for Defendant has not yet answered or appeared in this action. Additionally, the undersigned respectfully requests Your Honor grant the Defendant an additional 30 days to respond to the Complaint until September 15, 2022, so that the Defendant has ample opportunity to appear and defend themselves in this Action. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff’s Counsel. This is the Plaintiff’s first request for an extension.

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.